

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN

ALVIN BALDUS, CARLENE BECHEN, ELVIRA
BUMPUS, RONALD BIENDSEIL, LESLIE W.
DAVIS, III, BRETT ECKSTEIN, GLORIA
ROGERS, RICHARD KRESBACH, ROCHELLE
MOORE, AMY RISSEEUW, JUDY ROBSON,
JEANNE SANCHEZ-BELL, CECELIA
SCHLIEPP, TRAVIS THYSSEN, CINDY
BARBERA, RON BOONE, VERA BOONE,
EVANJELINA CLEERMAN, SHEILA COCHRAN,
MAXINE HOUGH, CLARENCE JOHNSON,
RICHARD LANGE, and GLADYS MANZANET,

Plaintiffs,

Case No. 11-C-00562
JPS-DPW-RMD

TAMMY BALDWIN, GWENDOLYNNE MOORE
and RONALD KIND,

Intervenor-Plaintiffs,

v.

Members of the Wisconsin Government
Accountability Board, each only in his official
capacity: MICHAEL BRENNAN, DAVID
DEININGER, GERALD NICHOL, THOMAS
CANE, THOMAS BARLAND, and TIMOTHY
VOCKE, and KEVIN KENNEDY, Director and
General Counsel for the Wisconsin Government
Accountability Board,

Defendants,

F. JAMES SENSENBRENNER, JR., THOMAS E.
PETRI, PAUL D. RYAN, JR., REID J. RIBBLE,
and SEAN P. DUFFY,

Intervenor-Defendants.

VOCES DE LA FRONTERA, INC.,
RAMIRO VARA, OLGA VARA,
JOSE PEREZ, and ERICA RAMIREZ,

Plaintiffs,

v.

Case No. 11-C-1011
JPS-DPW-RMD

Members of the Wisconsin Government
Accountability Board, each only in his official
capacity: MICHAEL BRENNAN, DAVID
DEININGER, GERALD NICHOL, THOMAS
CANE, THOMAS BARLAND, TIMOTHY
VOCKE, and KEVIN KENNEDY, Director and
General Counsel for the Wisconsin Government
Accountability Board,

Defendants.

JOINT REPORT
(PURSUANT TO COURT'S ORDER OF 3/27/12)

The defendants, along with the *Baldus* and *Voces de la Frontera* plaintiffs (the "Parties"), submit this Joint Report regarding their efforts to draft an alternative configuration for Assembly Districts 8 and 9 consistent with this Court's order of March 27, 2012.

DETAILS OF MEET AND CONFER CONFERENCES

The Parties conducted several conferences and an in-person meeting to address the remedies phase of this litigation. On the morning of March 27, 2012, the Parties agreed to exchange proposed alternative maps by early afternoon on March 28, 2012, and to meet in person to determine whether a single map could be submitted to the Court for its consideration. That day, counsel had several conversations detailing various proposals and the means by which to best submit them. Outreach to other potentially interested individuals was also discussed.

On the afternoon of March 28, 2012, counsel exchanged alternative maps for Assembly Districts 8 and 9 together with information regarding HVAP (Hispanic Voting Age Population) percentages, CVAP (Hispanic Citizen Voting Age Population)¹ percentages, population deviations from the 2002 Assembly map and core retention for the Assembly representative of Assembly District 8. Later that day, counsel for the Parties discussed the various map configurations. Counsel for the Parties also discussed alternative map configurations with members of the Milwaukee Latino community.

Counsel for the Parties met in person on the afternoon of March 29, 2012, for over two hours to discuss the proposed alternative maps as well as other proposals and options. The parties agreed to consider the proposals and to confer again on March 30, 2012.

On March 30 and April 2, 2012, counsel for the Parties further communicated regarding proposed alternatives by email and telephone.

¹Because citizenship information is not contained in the decennial Census, the parties engaged their experts (Professor Kenneth Mayer and Dr. Peter Morrison) to estimate the CVAP percentages for the map alternatives. Defendants do not concede that all of these factors represent proper considerations under the Voting Rights Act. Defendants do not concede that CVAP is the “relevant measure” for evaluating a district under the Voting Rights Act. By submitting this information, the defendants do not intend to waive their right to argue on appeal that the Court erred in concluding CVAP was the “relevant measure.” (Opinion at 24).

Based upon the Meet and Confer requirements of this Court, the Parties can advise the Court that there will not be a Joint Recommendation.

Dated this 3rd day of April, 2012.

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